ORIGINAL

EX PARTE OR LATE FILED

BELLSOUTH

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June 7, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RE: Ex Parte Presentation in WT Docket No. 99-217 and Docket No. 96-98

Dear Ms. Salas:

On June 6, 2000, representatives of Bell Atlantic, GTE Service Corporation, SBC Communications, Inc. and BellSouth Corporation met with members of the Wireless Telecommunications Bureau and Common Carrier Bureau concerning issues related to the above-mentioned proceedings.

The attached documents were used for discussion purposes. Please associate this notification and accompanying materials with the referenced docket proceedings. Attached is the list of participants in the meeting.

If there are any questions concerning this matter, please contact the undersigned.

Sincerely,

Ben G. Almond

Ben G. Almond
Vice President-Federal Regulatory

Attachment

cc: Jeffery Steinberg
Leon Jackler
Paul Noone
Tim Peterson
Susan Magnotti
J. Rodriguez
Jon Reel
Staci L. Pies

June 7, 2000

June 6, 2000 Ex Parte – WT Docket No. 99-217 and CC Docket No. 96-98

Industry Participants:

Bell Atlantic
Joe Mulieri
Larry Katz

GTE
Scott Randolph
Karl LaPorte

SBC
Steve Dyke

BellSouth
Keith Milner
Ben Almond

FCC Participants:

WTB
Jeffrey Steinberg
Leon Jackler
Paul Noone

CCB
Tim Peterson
Susan Magnotti
J. Rodriguez
Jon Reel
Staci L. Pies

ACCESS TO MTE PROPERTIES

- *Record shows no evidence that owners are pervasively denying access.*
- *Mandatory access rule would lead to protracted litigation.*
- *FCC has authority to regulate communications providers.*
- *Most effective way to ensure competitive access is to require:*
  - *all communications providers to give access to in-building wire they own or control,*
  - *in a fair and reasonable manner,*
  - *where technically feasible.*
- *FCC should encourage property owners to install infrastructure (conduit, backboards and other support structures) in such a way that facilitates service provisioning from multiple carriers.*
- *Non-value-added "gatekeeper" access fees should be prohibited.*

DEMARCATION POINT ISSUES

- *Location of demarcation point does not affect whether competitors receive access at a Single Point of Interconnection (SPOI).*
- *Current Part 68.3 rule should be retained.*
  - *Provides flexibility needed by owners and carriers.*
  - *Forced moves of existing demarcation points could lead to service disruptions, inefficient networks and high costs.*
- *The more access paths to end user, the better.*
  - *Subject to physical constraints of building infrastructure.*
  - *UNEs will provide carriers access to end customers even when building infrastructure (conduit, backboards and other support structures) is at exhaust.*
- *Forced MPOE will chill deployment of new technologies and may require unnecessary, expensive and confusing retraining.*

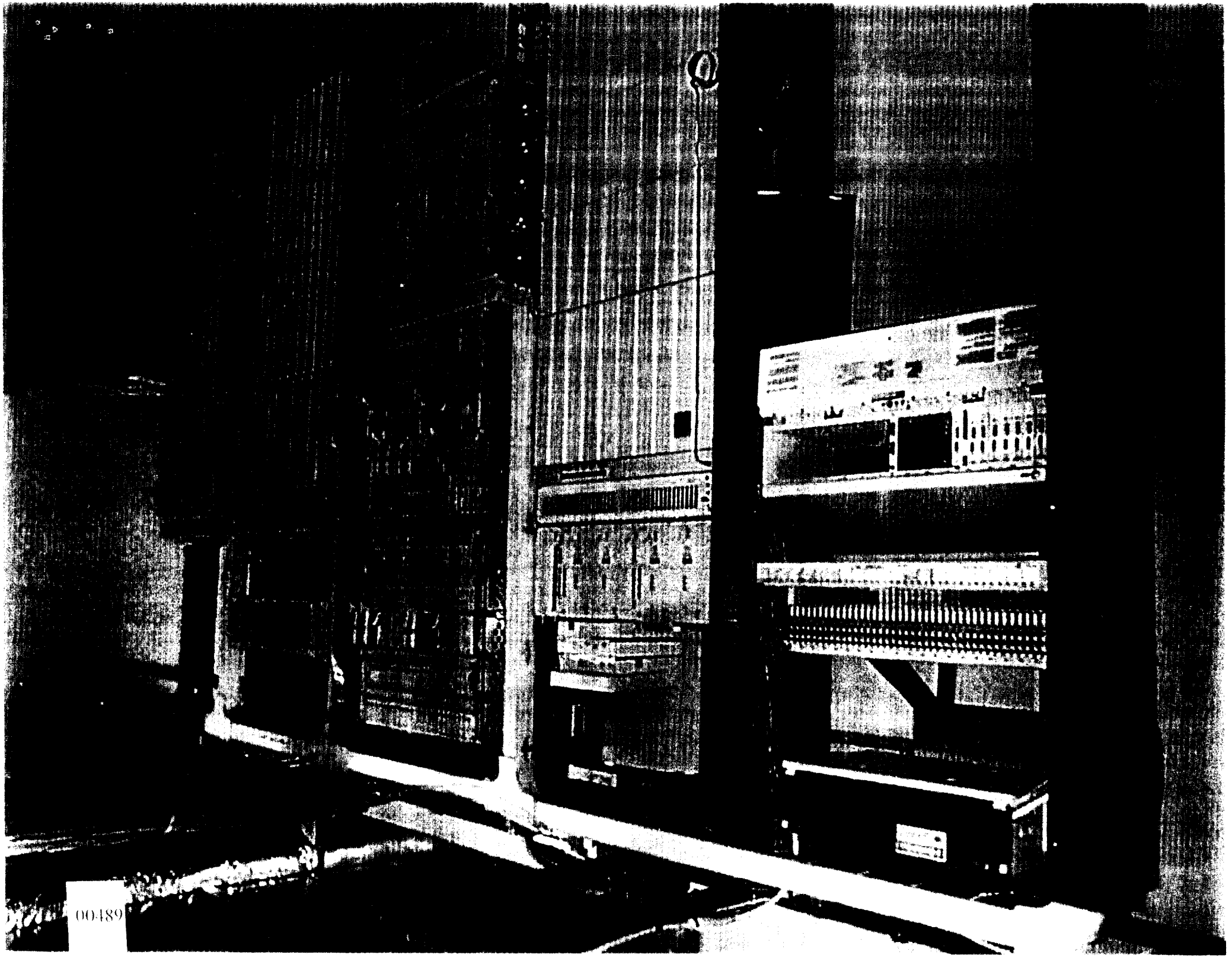
EXCLUSIVE CONTRACTS

- ***Exclusivity, whether "facilities" or "service" is not consistent with the goals of the Telecom Act of 1996.***
- ***Commission should adopt a rebuttable presumption that service providers cannot initiate or enter into such contracts***
  - ***at least for X time period;***
  - ***after which the Commission may revisit this prohibition.***

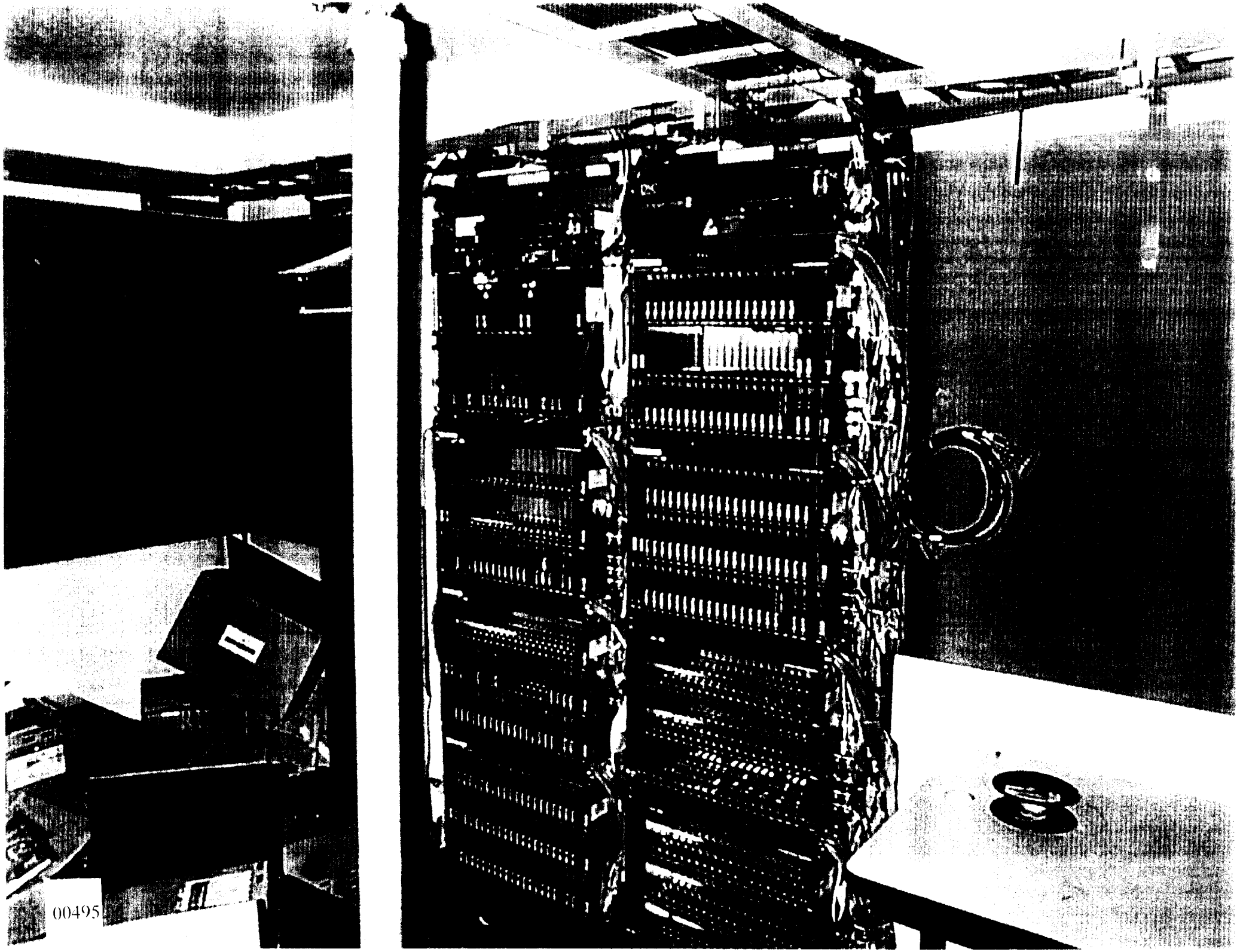
OC1

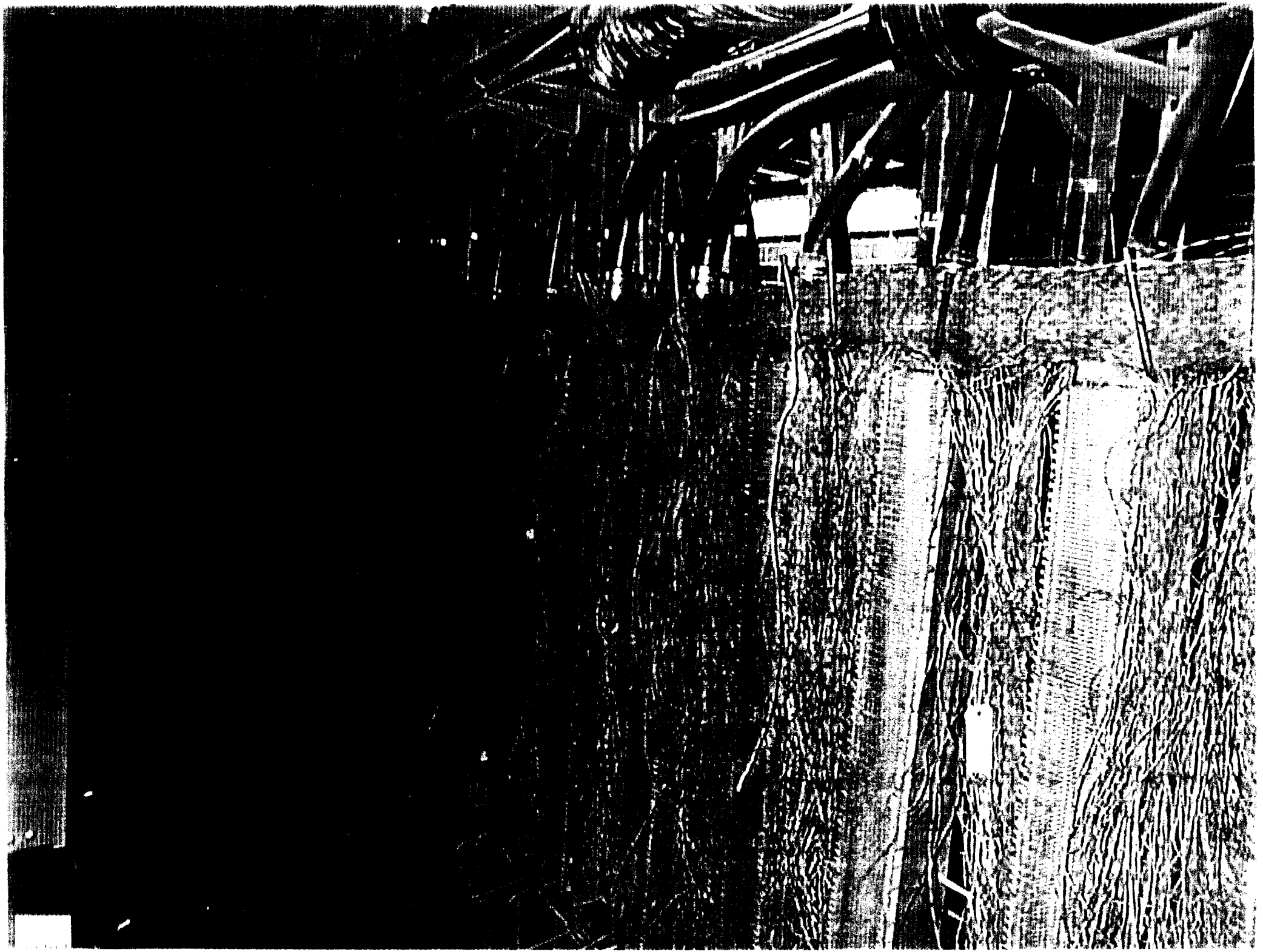
KEY TO PHOTOS

FILE DESIGNATION	SCENARIO DEPICTED
OC1.....	***(Name/location of building deleted)*** Fiber In The Loop (FITL) equipment located on 1st and 19th floors of residential highrise building. FITL equipment installed at upper floors to accommodate building owner's space availability and to minimize wire length from electronics to end users; i.e., due to transmission distance limitations of copper wire. Equipment on 19th floor cannot be moved to MPOE inside of the building due to lack of space. (All available space on 1st floor already used by other FITL equipment.) Move of all equipment to property line MPOE would require installation of outside remote terminal enclosures and re-cabling of the building. Estimated cost of labor and materials is $150,000. Even assuming owner would permit such a move, it could not be accommodated without the installation of a totally redundant system and subsequent removal of the existing system. This cost does not include the cost of additional conduit that the owner would provide.



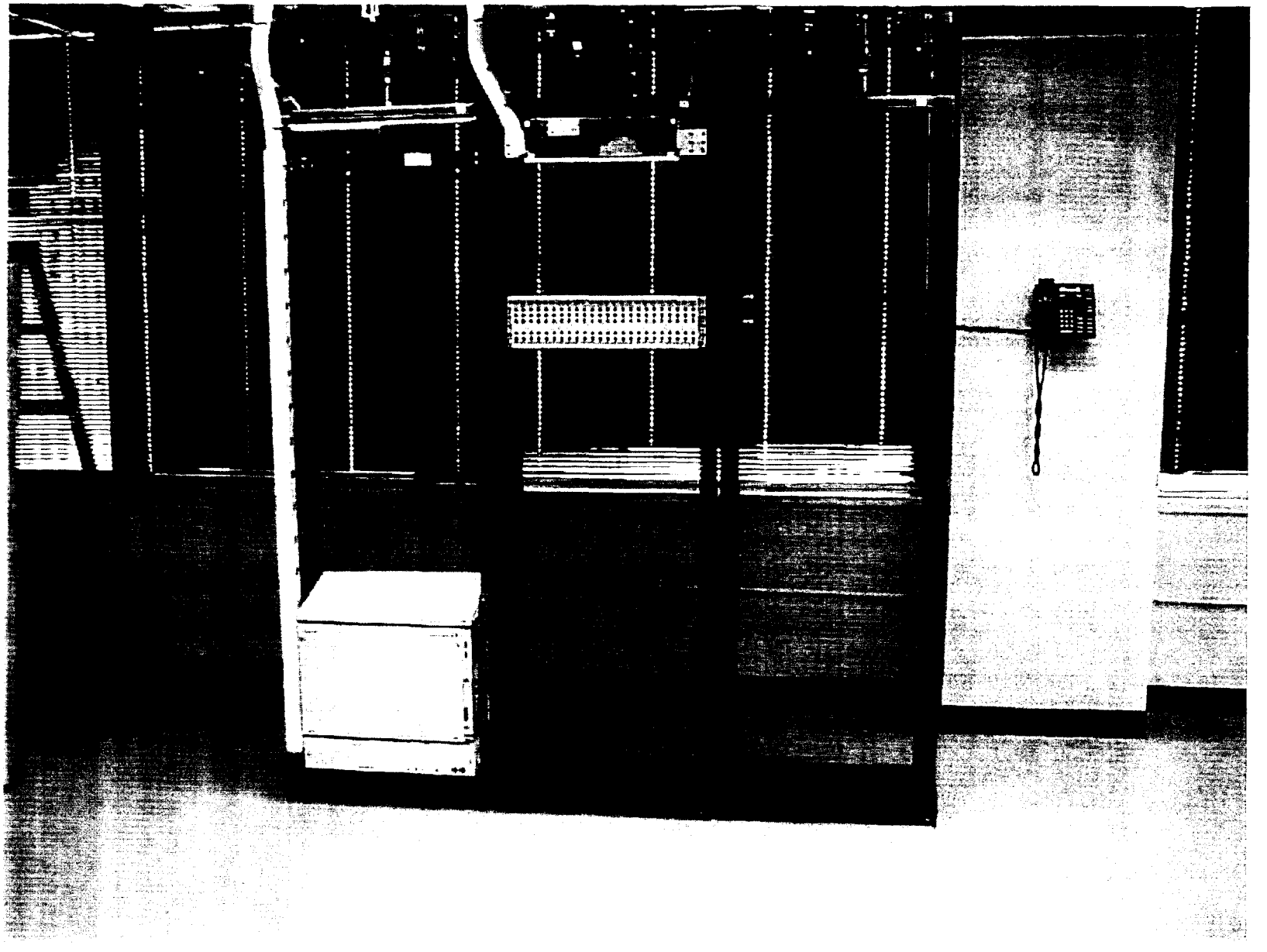
00489


00495

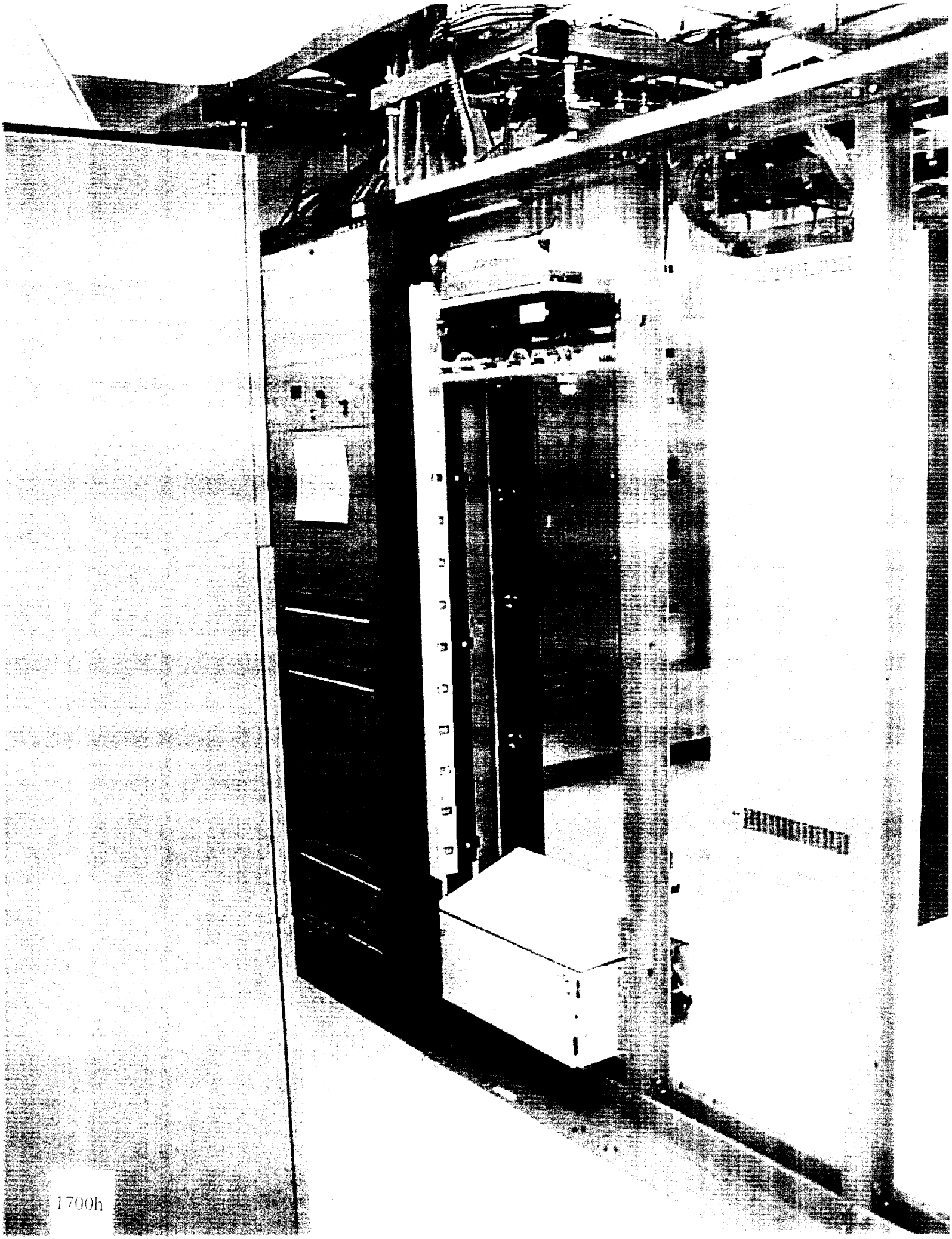


KEY TO PHOTOS

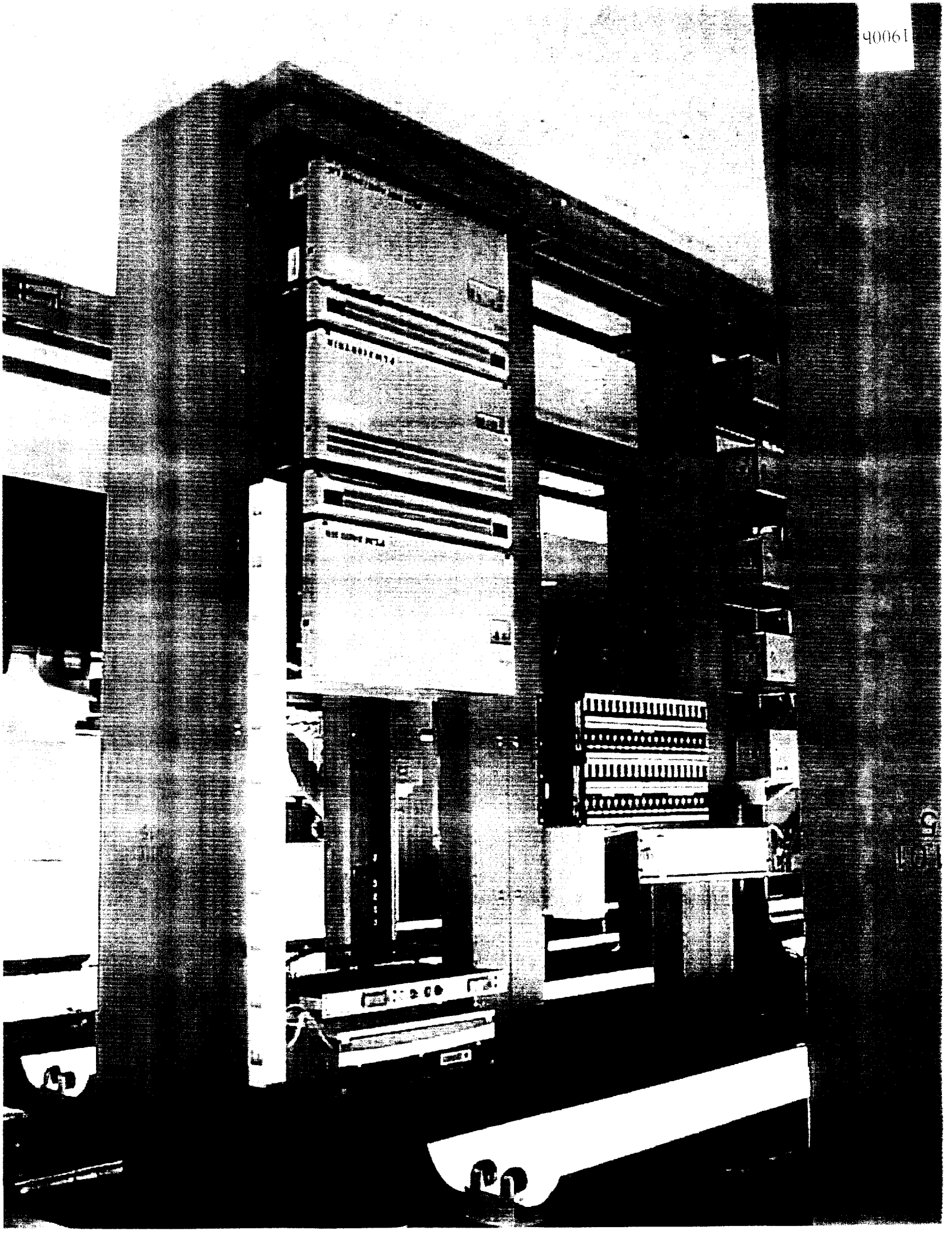
FILE DESIGNATION	SCENARIO DEPICTED
00489	***(Name/location of building deleted)*** This equipment room is on the 40th floor of a building serving multiple governmental agencies. Shown are fiber optic-fed multiplexers, digital loop carrier channel banks, alarm panels, T1 repeaters, lightguide and digital cross-connect panels.
00495/00496	Same building. These two photos depict the equipment room located on the 16th floor. It houses additional digital loop carrier equipment and cross-connect facilities.
00497	Same building, main entrance facility room in the basement housing lightning protectors for copper cable entrances and main riser cable cross-connects. There is no room in the basement of this building to house the 40th and 16th floor equipment, however, if there was, the estimated labor and material cost to effect a move to MPOE is $430,000. This cost includes recabling the building which would be required to accommodate the new electronics location. It should be noted that, in any case, the occupants of this building would not tolerate the disruption of such a move.

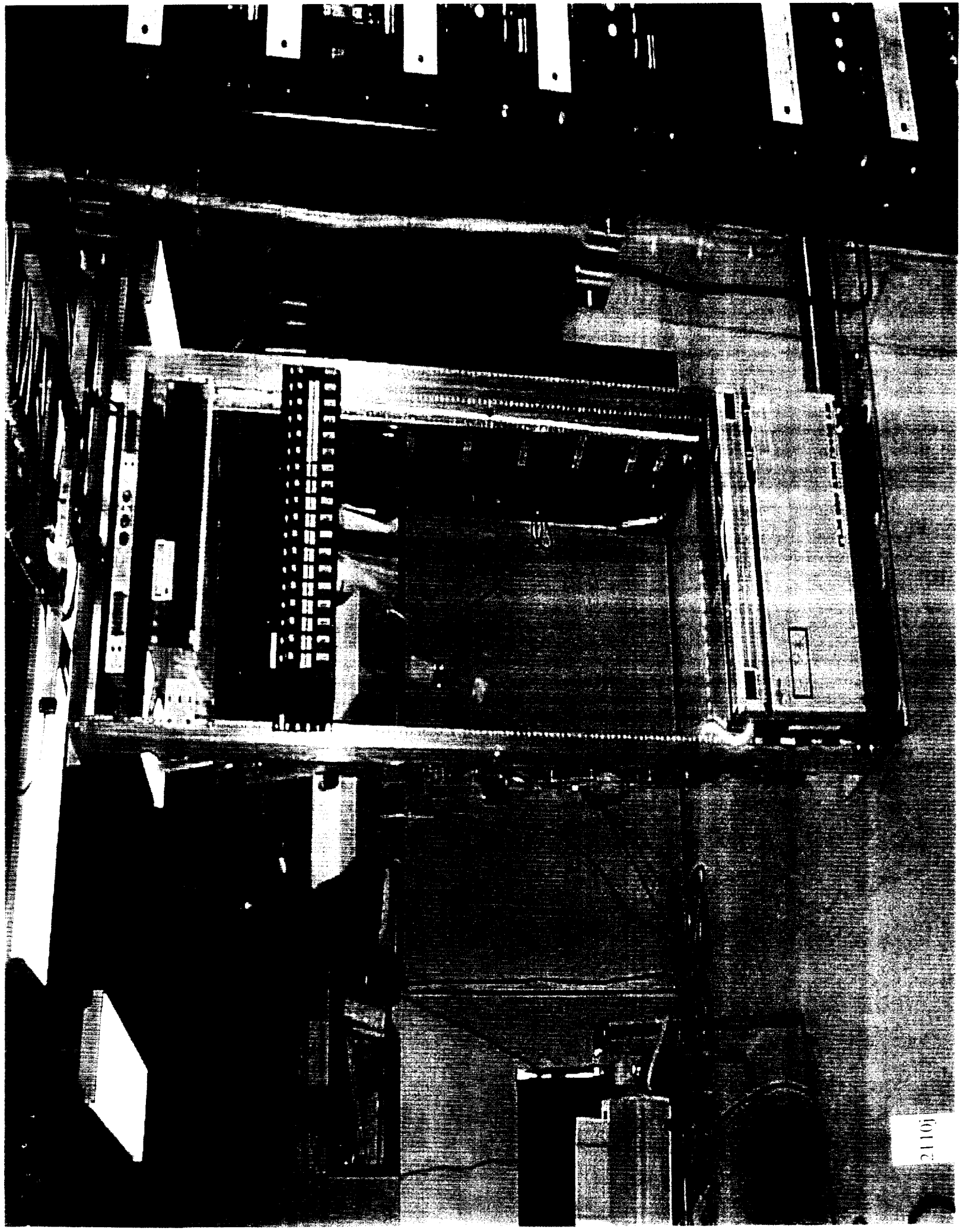


1500d



1700h





KEY TO PHOTOS

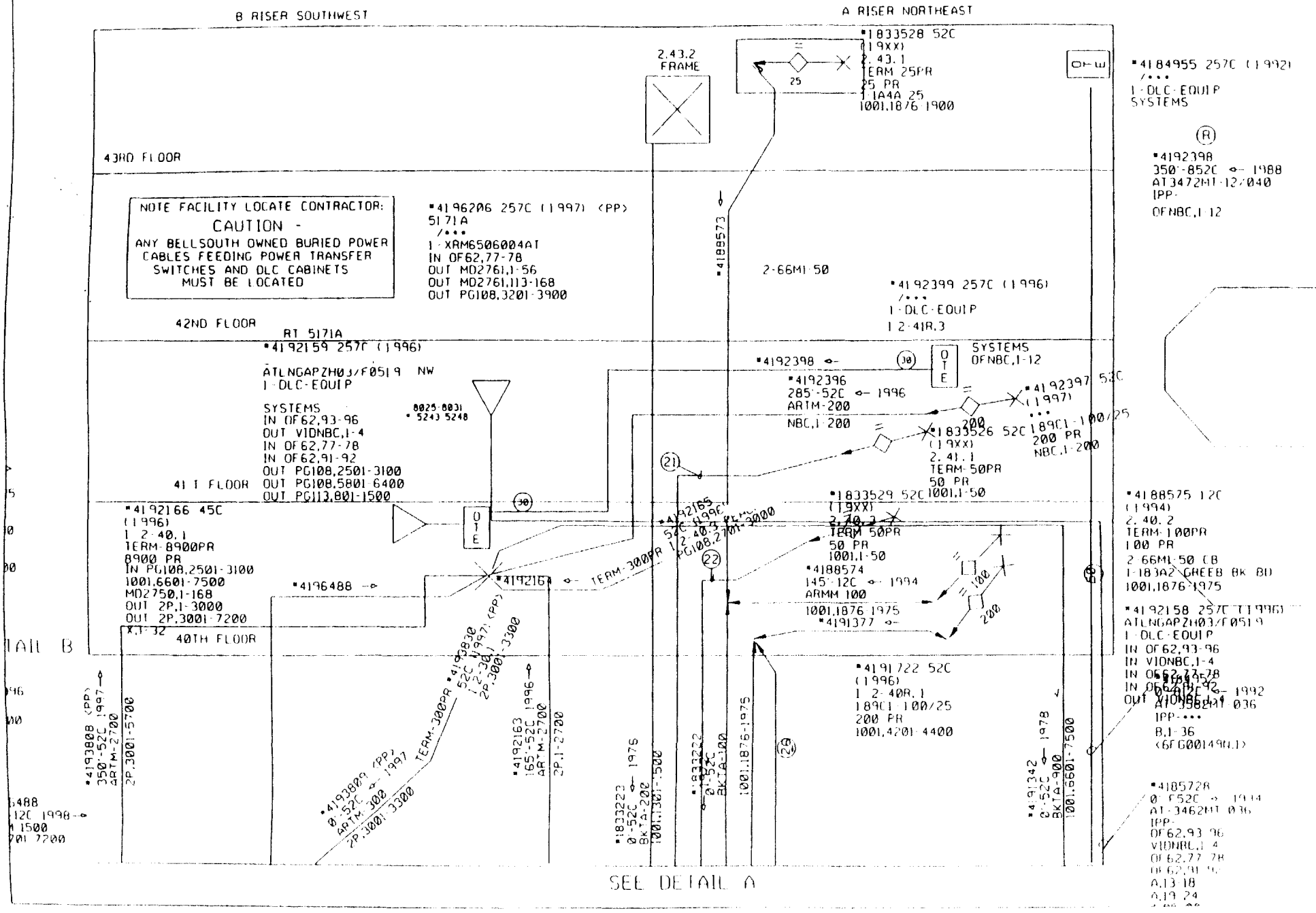
FILE DESIGNATION	SCENARIO DEPICTED
1500d	***(Name/location deleted)*** Suite 1500 (15 floor) DDM-2000 multiplexer (OC12), Fiber Terminal, Fuse & Alarm Panel, DSX3 digital cross-connect
1700h.	***Name/location deleted*** Suite 1700 (17th floor) DDM-2000 mux. (OC3), Fiber Terminal, Fuse/Alarms, Digital cross-connect
1900b	***Name/location deleted*** Suite 1900 (19th floor) FLM-600 mux (OC12) and FLM-2400 mux (OC48), Fiber Terminal, Fuse & Alarm Panel, digital cross-connect DSX3
2110j	***Name/location deleted*** Suite 2110 (21st floor) FLM-600 mux (OC12), Fiber Terminal, Fuse & Alarm Panel, digital cross-connect DSX3

SUMMARY

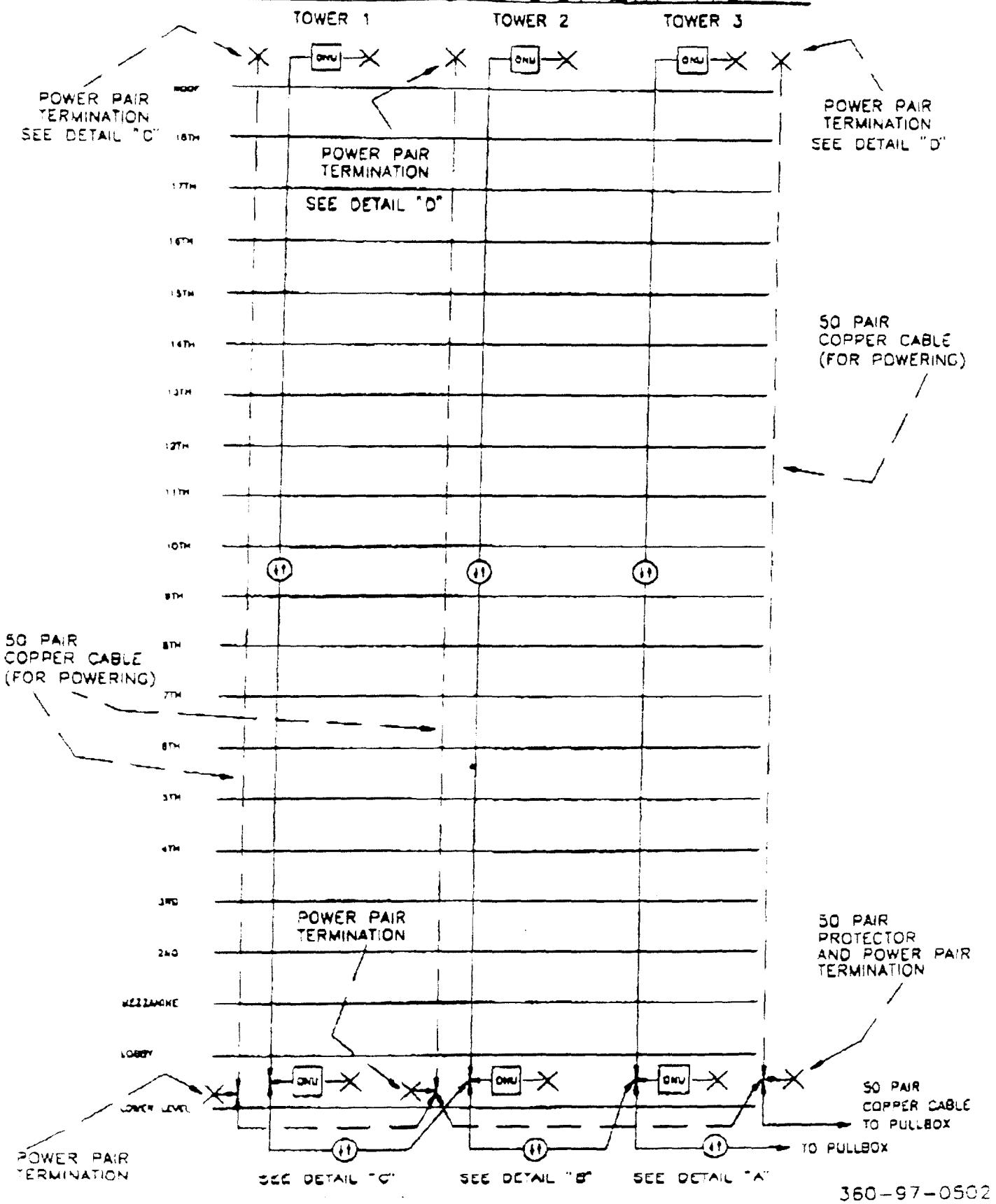
Name/locaton of building deleted is an example of a "Carrier Hotel"; that is, a building which is occupied primarily by various providers of communications services. These pictures depict just four of the floors in this highrise. These customers typically demand that BellSouth's fiber optic cables be routed directly to their premises and that the serving multiplexers and digital loop carrier equipment be located in their own equipment rooms. Such carriers seek out buildings located in areas where BellSouth has known fiber-optic deployment and where the building owner will provide adequate riser conduits to accommodate their unique requirements.

Due to the sheer amount of equipment that such carriers require, in addition to their demand for utmost security, it would not be possible to locate all serving equipment at the MPOE. Although moving such equipment to MPOE is simply not possible, the cost to do so would be in the millions of dollars.

Such "Carrier Hotels" are excellent examples of why owners and end users must have the flexibility to designate a demarcation point that best suits their individual requirements.

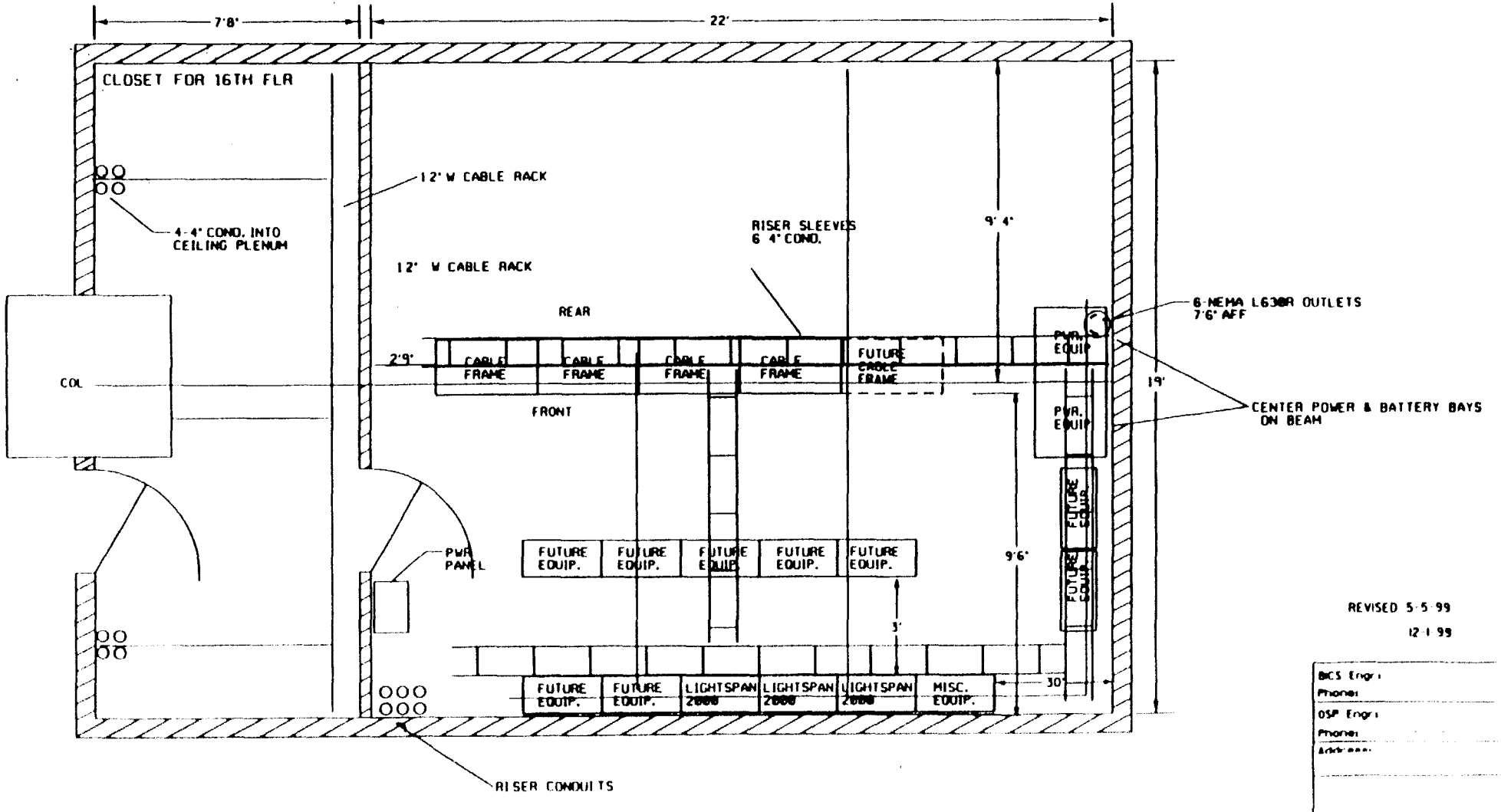

B RISER SOUTHWEST
A RISER NORTHEAST
2.43.2 FRAME
43RD FLOOR
42ND FLOOR
41 I FLOOR
40TH FLOOR
NOTE FACILITY LOCATE CONTRACTOR:
CAUTION -
ANY BELLSOUTH OWNED BURIED POWER CABLES FEEDING POWER TRANSFER SWITCHES AND DLC CABINETS MUST BE LOCATED
RT 5171A
ATLNGAPZH03/F0519 NW
1-DLC-EQUIP
SYSTEMS
IN OF62,93-96
OUT VIDNBC,1-4
IN OF62,77-78
IN OF62,91-92
OUT PG108,2501-3100
OUT PG108,5801-6400
OUT PG113,801-1500
SYSTEMS OFNBC,1-12
2-66M1-50
50 PR
200 PR
100 PR
8900 PR
SEE DETAIL A

CABLE RISER SCHEMATIC



360-97-0502
DWG. 7 OF 9

DETAIL NEW 16 FLOOR ELECTRONICS ROOM



REVISED 5-5-99

12-1-99

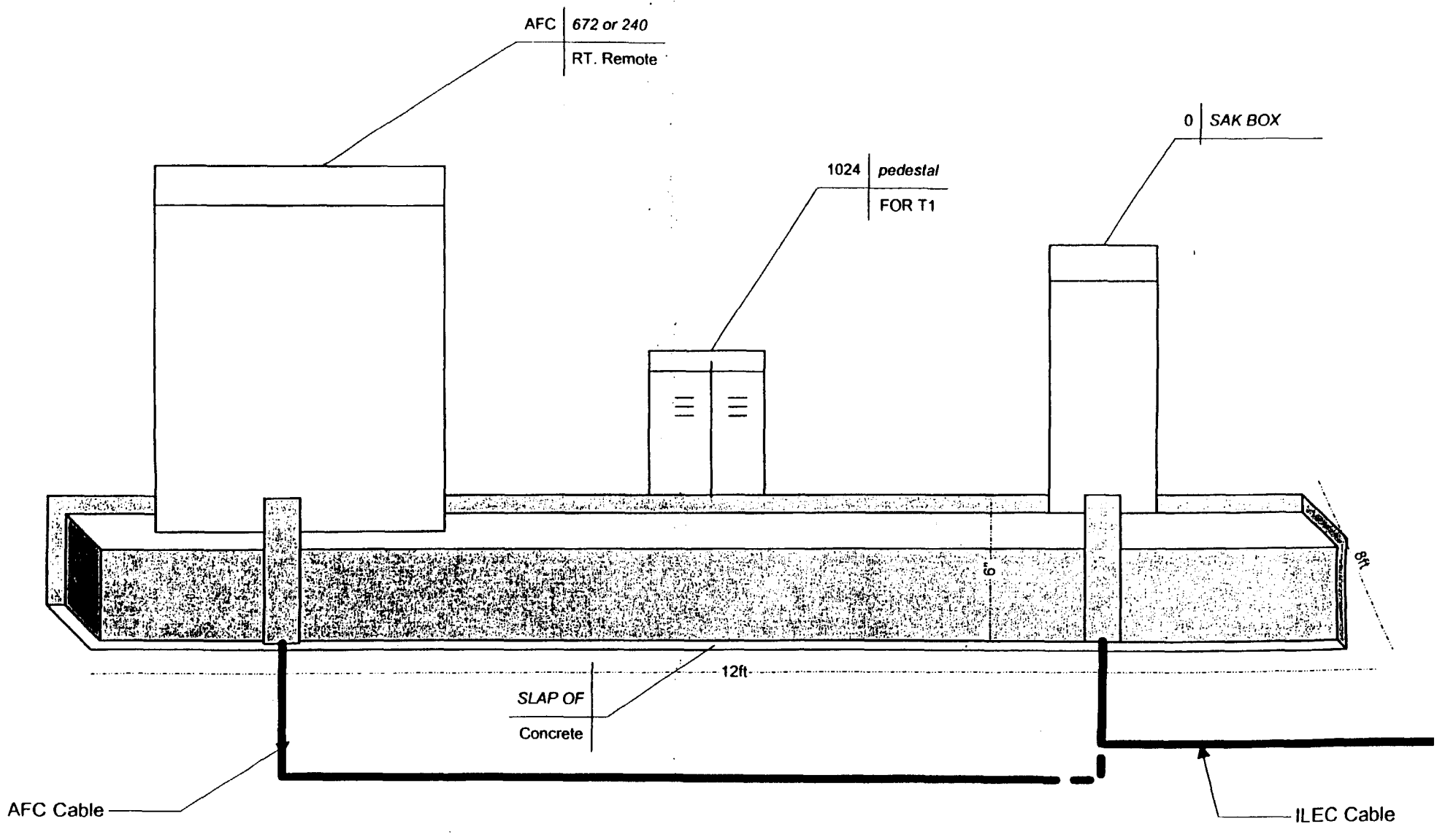
BICS Engr:
Phone:
OSP Engr:
Phone:
Address:

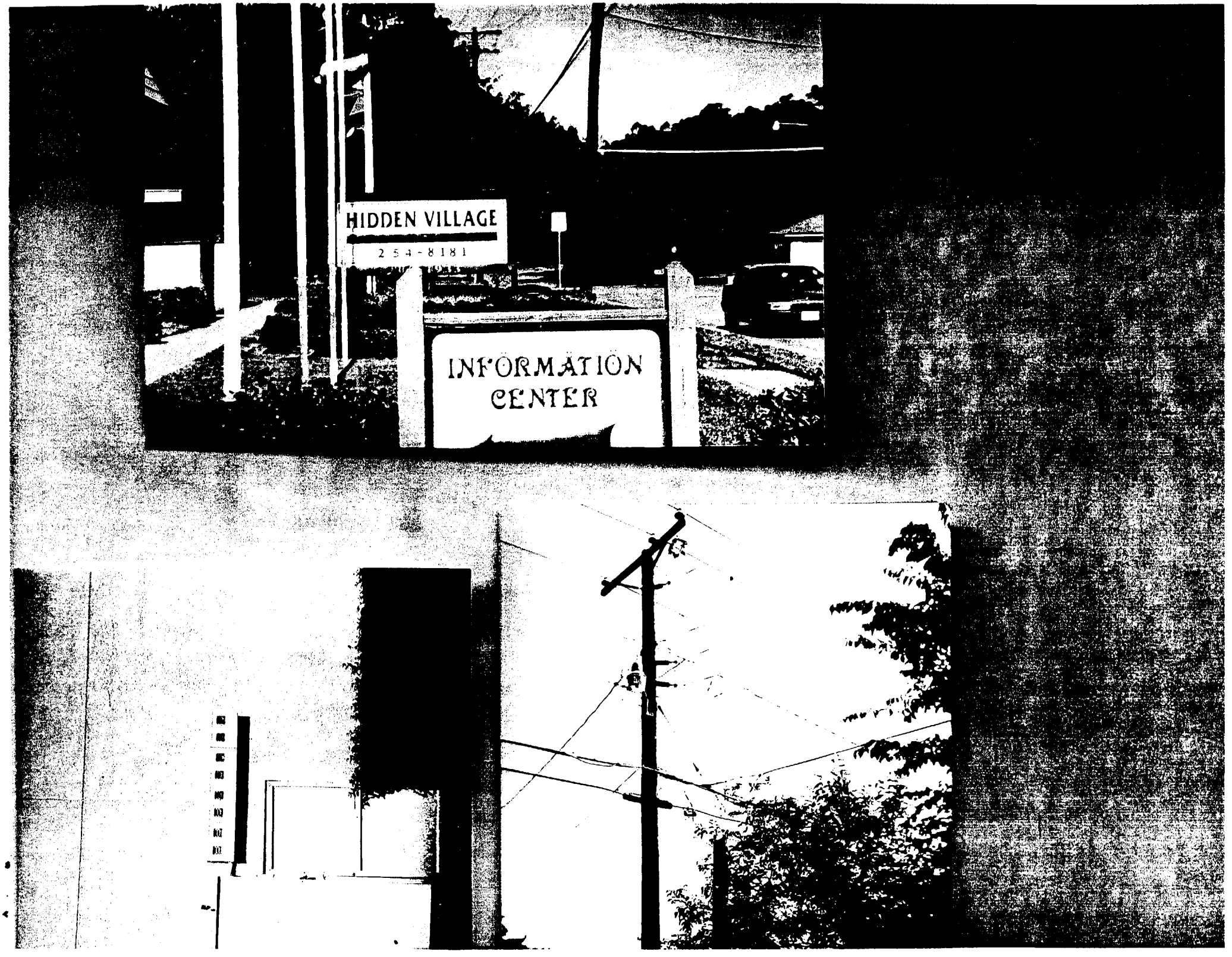
BICS No.: AW0239

Int. 1 of 5

SCENARIO DEPICTED
(Actual Case)

This is an example of the least complex scenario for a maximum to minimum point of demarcation conversion. The property depicted is a two decade old 150 unit "garden style" apartment complex (photo A) with multiple buildings that are demarcated at each building (photo B). The competitive local exchange carrier requesting the conversion specified that the existing 300 pair entrance cable be dropped from the utility pole (photo C) at the property line to a interconnection point as depicted in Figure D (supplied by the requesting carrier. The cost estimate for this conversion includes engineering, labor, and material required for placing a building terminal at the interconnection point and splicing the existing 300 pair cable at 3 locations for a total of 900 splices. The total estimate for this conversion, including verification and running jumpers, is $8,975.


AFC | 672 or 240
RT. Remote
1024 | pedestal
FOR T1
0 | SAK BOX
6"
8ft
12ft
SLAP OF
Concrete
AFC Cable
ILEC Cable


HIDDEN VILLAGE
254-8181
INFORMATION
CENTER